

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO. 12-CR-30263-MJR
)	
MARIO ORDUNA,)	
a/k/a "El Abogado,")	
)	
Defendant.)	

STIPULATION OF FACTS

Between approximately April 2008 and March 2011, Ivan Vazquez-Gonzalez was the leader of an organization which engaged in a conspiracy to distribute and possess with the intent to distribute cocaine. The organization operated in Madison and St. Clair Counties, within the Southern District of Illinois, Missouri, and elsewhere. The Defendant knowingly became a member of that conspiracy with the intention of furthering the conspiracy so that its goals could be achieved. In addition to Vazquez-Gonzalez and the Defendant, members of the conspiracy included, but was not limited to, Saul Ruelas-Valdovinos, Salvador Navarro, Daniel Ortiz, Jose Garcia, Luis Gonzalos Hernandez-Barahono, Jessica Hernandez, Jose Murillo, Oscar Valle Ortiz, Carmelo D. Mendoza, Florentino Cruz-Amado, Javier Villasenor-Cardona, Armando Murillo, Guillermo Barbosa-Ku, Edwin Fernando-Montejo, Manuel Ramirez, Francisco Perez, Victor Alberto Montalvo-Perez, Jorge Desantiago, Sandra Renee Seman, Jose J. Ramirez-De Avila, Francisco Sanchez, Raul Gonzalez-Gonzalez, Jaime Hernandez, Homero Hernandez-Vega, and Antonio Escobar.

The organization was responsible for importing cocaine from Mexico into the United States,

where it was taken to Chicago, Illinois. From Chicago, the cocaine was transported by members of the conspiracy to the St. Louis Metropolitan area, including areas within the Southern District of Illinois, where it was distributed by various members of the organization. Proceeds for the sales of the cocaine were then transported back to the leaders of the conspiracy in Chicago.

Defendant's role in the conspiracy was as a distributor of cocaine and interpreter for the organization. He obtained cocaine from or through co-conspirator Ivan Vazquez-Gonzalez, Luis Hernandez-Barahono, Raul Gonzalez-Gonzalez, and Carmelo Mendoza, broke it down, and sold it to several customers in and around the St. Louis Metropolitan area. On at least two occasions, in approximately June and July of 2010, he obtained quantities of cocaine from co-conspirators at the Fairmont Park Race Track within the Southern District of Illinois, which was intended for redistribution.


In approximately March 2010, Defendant was contacted by Ivan Vazquez-Gonzalez, and asked to act as an interpreter when an attorney met with two Spanish-speaking co-conspirators (who had been arrested while transporting cocaine for Vazquez-Gonzalez) at the Madison County Jail. Defendant was compensated with a quantity of cocaine for the interpretation services. Defendant admitted that he sold that cocaine for approximately \$700 per ounce.

On April 10, 2012, the Defendant was advised of his *Miranda* rights, waived those rights, and gave a statement to the Drug Enforcement Administration in which he admitted providing interpretation services for the organization as described in the previous paragraph. The Defendant also admitted obtaining cocaine for resale on several occasions from members of the conspiracy.

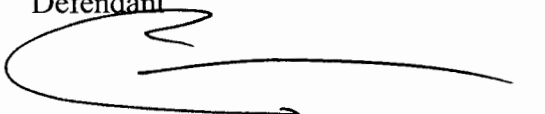
The parties stipulate and agree that the readily provable amounts of cocaine if this matter were to proceed to trial would result in the Defendant's relevant conduct being approximately 9.05

kilograms of cocaine. Defendant further stipulates and agrees that a portion of the \$18,500 United States currency that DEA seized from his residence on April 10, 2012, represented money received from drug sales and that he had spent the rest of the money he made from selling cocaine to pay "bills and rent" so that he would not have to use his savings for those purposes. Defendant consents to the forfeiture of the \$18,500 to the United States.

SO STIPULATED:



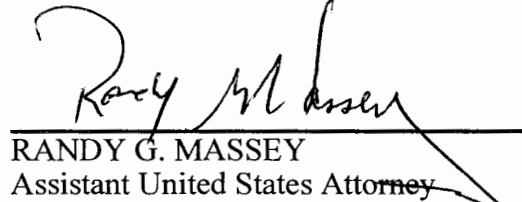
MARIO ORDUNA
Defendant



PAUL J. D'AGROSA
Attorney for Defendant

Date: 4/11/13

STEPHEN R. WIGGINTON
United States Attorney



RANDY G. MASSEY
Assistant United States Attorney

Date: 4-11-13